IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

Kathleen Ragan, an individual.)	
)	
Plaintiff/Counterdefendant,)	
)	
v.)	Case No. 1:17-cv-09208
)	
BP Products North America, Inc.,)	
a Maryland corporation;)	Judge: Honorable Marvin E. Asper
BP America, Inc.,)	
a Delaware corporation;)	
)	Jury Trial Demanded
Defendants/Counterplaintiffs	s.)	

PLAINTIFF'S RULE 56(A) MOTION FOR PARTIAL SUMMARY JUDGMENT

Pursuant to Federal Rule of Civil Procedure 56(a), Plaintiff/Counter-Defendant, Kathleen Ragan, moves for summary judgment against Defendants' counterclaim. As demonstrated in Kathleen Ragan's Memorandum in Support filed contemporaneously with this Motion, there is not a genuine dispute as to any material fact and Kathleen Ragan is thus entitled to judgment as a matter of law.

Respectfully submitted,

Kathleen Ragan
/s/ Joseph L. Kish
One of her Attorneys

Joseph L. Kish – jkish@smsm.com Matthew D. Kelly – mkelly@smsm.com Segal McCambridge Singer & Mahoney Ltd. 233 South Wacker Drive, Suite 5500 Chicago, Illinois 60606 (312) 645-7800